Economic and Environmental Sustainability Task Force

January 16, 2013

Mayor Bob Filner
City of San Diego
202 C Street, MS 11A
San Diego, CA 92101

Re: San Diego Climate Mitigation and Adaptation Plan (CMAP)

Dear Mayor Filner,

Congratulations on your election and thank you for your focus on climate change, solar energy, transit and healthy, livable, bikeable communities in your State of the City address.

The Economic and Environmental Sustainability Task Force (EESTF) was established in 2010 by the City Council to provide input on the development of the Climate Mitigation and Adaptation plan (CMAP). The CMAP is a seminal city document to help protect and enhance the resilience of our City's economic, natural, and community assets as well as the health and well-being of residents and future generations.

One community representative from each of the eight Council Districts and the Mayor's Office were selected and we met monthly over the course of a year starting in January 2011. We are still meeting as needed until the CMAP is adopted. Our comments are independent of the Mayor's office and City staff.

As you described in your State of the City address, climate change will impact all San Diegans with brute force. It is imperative we take immediate and urgent action to reduce carbon emissions and plan for a changing environment.

While there are many valuable and positive elements to the draft CMAP, we believe the following improvements are necessary to adequately protect human health and the environment from the impacts of climate change. We believe that these changes will bring a much broader level of support to the CMAP from across our communities, and we hope that these changes can be incorporated in an expeditious process that does not significantly delay the acceptance and implementation of the plan.

I. Identify Greenhouse Gas (GHG) Emission Reduction Strategies that Meet State Targets from 2020-2035

The current draft CMAP models carbon mitigation strategies to reach the 2020 state goal set by AB 32 as well as a "planning horizon" in line with Executive Order S-3-05, but it does not include strategies adequate to reach the 2035 targets. This leaves the residents

of San Diego vulnerable and not fully informed about what it will take to effectively manage and mitigate our changing climate into the future.

There are also some significant weaknesses in CMAP assumptions for the 2012-2020 timeframe. For example, current rooftop PV costs are one-half or less than the commercial and residential rooftop PV cost assumptions in the draft CMAP. This is the primary reason that rooftop PV projections are quite modest in the draft CMAP, 150 MW by 2020. There are already 70 to 80 MW of rooftop PV in the city. Rooftop PV deployment would have to decelerate to achieve only 150 MW by 2020. In contrast, the Governor's Office is currently projecting that about 1,000 MW of local renewable energy will be added to SDG&E territory by 2020. Proportionately, about half of this 1,000 MW total, or 500 MW, would be in the City of San Diego. CMAP would show a much higher quantity of rooftop PV in 2020 if realistic current PV price assumptions are used in the document.

RECOMMENDATION: Include in a Longer-Term Implementation Plan for 2014-2020 discussed below, modeling and/or identification of strategies to fully reach 2035 GHG reduction goals, understanding that strategies will evolve as technology and science evolve. Also, review and update pricing assumptions for critical new infrastructure, like rooftop PV, necessary to achieve ambitious GHG targets. It is important for the Mayor, Council and community to understand and adopt the types of programs and policies and lifestyle changes it would take to reach these state goals.

II. Implementation and Monitoring: Adopt 2-Year Action/Implementation Plan Now

Critical to ensuring effective execution of modeled strategies and compliance with AB 32 is having an Action/Implementation Plan that includes annual monitoring of the City's GHG inventory, details a timeline for implementing prioritized strategies, specifies next steps for each responsible party, and sets benchmarks with dates for evaluating progress.

We are pleased to see some of these elements will be planned as a part of the proposed CMAP Monitoring Report (p. 6-1), but find it untenable that the reports are biannual and will not start until 2015. We also believe the inventory and monitoring reports need to be performed by an objective, outside entity such as Climate Registry The Action Plan for implementing and achieving the priority strategies is appropriate for City staff.

RECOMMENDATION: Change Chapter 6 to include annual monitoring and report to Council, and commit to revising the CMAP every four years, or as needed, to ensure the City will be on track to meet or exceed 2020 and 2035 goals.

RECOMMENDATION: Concurrent with the CMAP adoption, direct staff to return to Council in three months with a detailed Action/Implementation Plan for the next three years, targeted at the most cost-effective and critical strategies below:

1) **Benchmarking and Disclosure Ordinance for Commercial Buildings (replicate New York City's or San Francisco's ordinances)**
2) **Successful PACE and affordable financing programs for Residential and Commercial Buildings**
3) **Increase Mass Transit by 8% by 2020**
4) **Update Community Plans and Implement Transit-First Amenities under a Planning & Sustainability Department**
5) **Increase availability of local food options 50% by 2020**
6) **Divert 75% of trash from landfill disposal**
7) **How and when a more specific adaptation plan will be developed**

RECOMMENDATION: Direct staff to develop a Longer-Term Implementation Plan for 2014-2020 to be completed in time with the first annual report in 2014.

RECOMMENDATION: Clarify timelines, goals and outcomes expected from proposed stakeholder/working groups.

III. Adopt an Action Plan for Adaptation.

While emissions reductions within the City are a critical part of the CMAP, global greenhouse gas emissions are still rising and a significant level of climate change impact appears to be inevitable for our region and must be addressed. The CMAP identifies general lists of potential vulnerabilities and a basic process for adaptation planning, but falls short of representing a plan, and more specific, localized analyses of risks and responses are needed to develop an actionable adaptation plan. Development of an actionable adaptation plan will allow the City to focus and prioritize its limited resources, take advantage of early action and planning, and engage in effective collaboration with other local, state and federal agencies that are moving forward with similar planning efforts.

RECOMMENDATION: Prioritize adaptation resources and timing based on a risk vulnerability rating that takes into account both the likelihood of specific impacts occurring and the severity of those impacts on threatened natural resources, human health (especially on vulnerable populations including low-income and seniors), and critical infrastructure.

With these changes, we believe the draft CMAP can be an invaluable roadmap for tackling the challenges and opportunities that lie ahead. We look forward to collaborating with City staff, Council, the Mayor's Office, and the myriad of stakeholders to ensure that the CMAP is implemented to have the greatest impact on protecting our health, our natural resources, our infrastructure, and our economy.

Sincerely,

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Cc: Councilmembers;
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